

ASHBY & GEDDES

ATTORNEYS AND COUNSELLORS AT LAW

500 DELAWARE AVENUE

P. O. BOX 1150

WILMINGTON, DELAWARE 19899

TELEPHONE
302-654-1888

FACSIMILE
302-654-2067

June 6, 2007

The Honorable Gregory M. Sleet
United States District Court
844 N. King Street
Wilmington, Delaware 19801

VIA ELECTRONIC FILING

Re: *Monto-Carlo Country Club, et al. v. ATP Tour, Inc., et al.*,
D. Del., C.A. No. 07-198-GMS;
Deutscher Tennis Bund, et al. v. ATP Tour, Inc., et al.,
D. Del., C.A. No. 07-178-GMS

Dear Judge Sleet:

We represent defendants ATP Tour, Inc., Etienne de Villiers, and Charles M. Pasarell, Jr. in the above actions. On May 23, 2007, the Court issued an Order scheduling a status and scheduling teleconference in these matters for June 15, 2007 at 11:00 a.m.

Unfortunately, defendants' lead attorney, Bradley I. Ruskin of Proskauer Rose LLP's New York office, already has hearings scheduled to take place that same day in California and expects to be in court that entire day. Mr. Ruskin's hearings on June 15, 2007 are scheduled to take place in the Superior Court of the State of California for the County of San Diego. Mr. Ruskin is representing TMO CA/NV, LLC in *Site Management Services, Inc., et al. v. Cingular Wireless LLC, et al.*, Case No. GIC852215. Those hearings, both a trial readiness conference and hearings on multiple motions and cross-motions for summary judgment and for summary adjudication, are scheduled to begin at 12:00 p.m. EDT (9:00 a.m. PDT). As a practical matter, it will thus be exceedingly difficult (if not impossible) for Mr. Ruskin to attend the conference in this case since, in advance of those hearings, he needs to get to the courthouse and proceed past security. These hearings have been scheduled by the Court for more than two months and involve counsel for multiple parties, most of whom will be traveling to San Diego to attend. (Until this past Friday, June 1, Mr. Ruskin thought there was a small chance that the morning session might be adjourned, but it was then reaffirmed by the Court.) Mr. Ruskin's declaration is attached.

Therefore, we respectfully request that the Court reschedule the status and scheduling conference. Plaintiffs have no opposition to defendants' request. In an effort to help avoid any further conflicts, we have also conferred with counsel for the other parties and have been advised that all counsel could be available for a telephonic status and scheduling conference at the same time (11:00 a.m. EDT) on the prior day, June 14 (or any other time that morning) should the

The Honorable Gregory M. Sleet

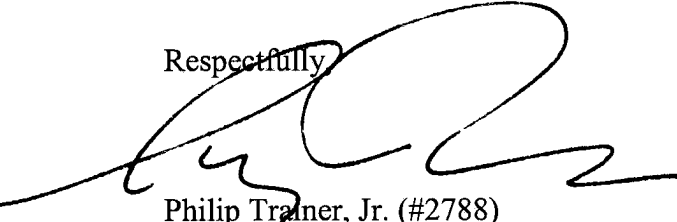
June 6, 2007

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Court consider that date convenient or appropriate. In addition, all counsel are available on June 12 (at any time) and on June 22 (at any time after 1:00 p.m. EDT) if either of those dates are considered preferable to Your Honor. Finally, Your Honor, although not preferable to counsel for defendants, one other alternative may be to move up the conference of June 15 to 10:00 a.m. EDT/7:00 a.m. PDT, so long as it can conclude within one hour.

We greatly appreciate the Court's consideration of this request, and we will make ourselves available at the Court's convenience in the event Your Honor wishes to discuss this matter further.

Respectfully,



Philip Trainer, Jr. (#2788)

cc: Philip A. Rovener, Esquire (via ECF & e-mail)
C. Barr Flinn, Esquire (via ECF & e-mail)
Robert D. MacGill, Esquire (via e-mail)
Alan M. Unger, Esquire (via e-mail)
Bradley I. Ruskin, Esquire (via e-mail)
Daniel Gravelyn, Esquire (via e-mail)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

-----	X	
DEUTSCHER TENNIS BUND (GERMAN	:	
TENNIS FEDERATION) and ROTHENBAUM	:	Civil Action No. 07-0178 (GMS)
SPORTS GMBH,	:	
	:	
Plaintiffs,	:	
	:	
against	:	
	:	
ATP TOUR, INC., JOHN DOE 1, JOHN DOE 2,	:	
JOHN DOE 3, JOHN DOE 4, JOHN DOE 5,	:	
JOHN DOE 6, JOHN DOE 7, JOHN DOE 8,	:	
JOHN DOE 9,	:	
	:	
Defendants.	:	
-----	X	
-----	X	
MONTE-CARLO COUNTRY CLUB and	:	
SOCIETE MONEGASQUE POUR	:	Civil Action No. 07-0198 (GMS)
L'EXPLOITATION DU TOURNOI DE TENNIS,	:	
	:	
Plaintiffs,	:	
	:	
against	:	
	:	
ATP TOUR, INC., ETIENNE DE VILLIERS, and	:	
CHARLES PASARELL,	:	
	:	
Defendants.	:	
-----	X	

DECLARATION OF BRADLEY I. RUSKIN

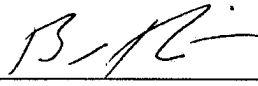
I, Bradley I. Ruskin, declare and state as follows:

1. I am a partner at Proskauer Rose LLP, counsel for defendants in the captioned matters, and I submit this declaration in support of the defendants' application for a continuance of the Rule 16 status and scheduling conference.

2. I am over the age of eighteen, and I have personal knowledge of the matters and facts contained in this Declaration and the accompanying correspondence to the Court of Philip Trainer, Jr.

3. I solemnly declare and affirm under penalty of perjury that these matters and facts are true and correct to the best of my knowledge, information and belief.

Executed this 6th day of June, 2007, at New York, New York.



Bradley I. Ruskin